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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Jeff Corbett, an individual; John Jenkins, an individual; Scott Murray, an individual; and David Newton, an individual,

Plaintiffs,

vs.

Public Employees' Retirement System, ex rel. State of Nevada; Las Vegas Metropolitan Police Department, a political subdivision of the State of Nevada; and Does I - X; inclusive,

Defendants.

Case No.: 2:20-cv-02149-KJD-NJK

STIPULATION AND ORDER TO EXTEND RESPONSE AND REPLY DEADLINES TO DISPOSITIVE MOTIONS (FIRST REQUEST)

Defendant Las Vegas Metropolitan Police Department, (the "Department" or "LVMPD"), by and through its counsel of record, Nick D. Crosby, Esq., of the law firm of Marquis Aurbach Coffing; and Plaintiffs, Jeff Corbett, John Jenkins, Scott Murray and David Newton (collectively "Plaintiffs"), by and through their counsel of record, Daryl E. Martin, Esq. of the law firm of Christensen James & Martin, Chtd., respectfully submit this Stipulation and Order to Extend the deadlines to file responses to dispositive motions and extend the corresponding reply brief deadlines.

I. REASONS FOR THE REQUESTED EXTENSION OF TIME

The Parties both timely filed Motions for Summary Judgment on March 28, 2022. (ECF Nos. 34 and 35). Responses to the Motions for Summary Judgment are due April 18, 2022. The

1 Parties seek a brief, one-week extension of the response deadline due to the fact counsel for
2 Defendant recently (as of the late morning of April 14, 2022), experienced a departure of his
3 administrative assistant. As such, additional time is necessary for Defendant's counsel to secure
4 a replacement to assist in the preparation of the responsive filing. Additionally, Defendant's
5 counsel recently filed a Motion for Temporary Restraining Order on Order Shortening Time in the
6 Eighth Judicial District Court, which is set for hearing on April 27, 2022. As such, counsel has
7 been required to direct attention to preparation of that case in light of the state court's issuances of
8 the order shortening time. This extension is brought in good faith and not for purposes of delay
9 and, instead, is sought to allow sufficient time for the parties to properly and fully brief the legal
10 issues presented in the respective dispositive motions.

11 **II. PROPOSED SCHEDULE**

12 With the above in mind, the Parties hereto agree to extend the current deadline to respond
13 to Dispositive Motions seven (7) days from April 18, 2022 to **April 25, 2022**. Further the Parties
14 request the reply deadline be extended to **May 16, 2022**.

15 The date for filing the Joint Pretrial Order shall be suspended until thirty (30) days after
16 decision on the dispositive motion or upon further Order by the Court extending the time period
17 in which to file the Joint Pretrial Order.

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1 This request is not sought for any improper purpose or for the purpose of delay. The Parties
2 respectfully submit that the reasons set forth above constitute good cause for the extended
3 deadlines requested above.

4 IT IS SO STIPULATED this 14th day of April, 2022.

5 CHRISTENSEN JAMES & MARTIN, CHTD. MARQUIS AURBACH

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7 By: /s/ Daryl E. Martin, Esq.

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14 *Attorneys for Plaintiffs Jeff Corbett, John
15 Jenkins, Scott Murray and David Newton*

By: /s/ Nick D. Crosby, Esq.

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12 **ORDER**

13 **IT IS SO ORDERED.**

14 DATED this 18th day of April, 2022.

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17 UNITED STATES DISTRICT JUDGE

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